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Attorneys for BRIGGS MANAGEMENT LLC

and BRIGGS MANAGEMENT, INC.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JAD-NJK

JESSICA MARTINEZ-ARRIAGA,

Case No.: 2:23-cv-01845-~~NJK-DJA~~

Plaintiff,

**Stipulation To Extend Dispositive
Motion Deadlines (First Request)**

vs.

BRIGGS MANAGEMENT LLC d/b/a and
a/k/a Fat Tuesday; and BRIGGS
MANAGEMENT, INC, d/b/a and a/k/a Fat
Tuesday., *et. al.*

Defendants.

Defendants BRIGGS MANAGEMENT INC. AND BRIGGS MANAGEMENT LLC, (“Defendants”) by and through their counsel of record, the law firm of LEWIS BRISBOIS BISGAARD & SMITH LLP; Plaintiff, JESSICA MARTINEZ-ARRIAGA, by and through her counsel of record, RAFII & ASSOCIATES, P.C., submit the following Stipulation to Extend Dispositive Motion Deadlines:

1. STATUS OF ACTION

On November 9, 2023, Defendants removed this matter from State Court to United States District Court, District of Nevada. Defendants’ Statement Regarding Removal was filed on November 29, 2023. The Parties’ Rule 26(f) Conference was held on December 5, 2023. The Parties’ Joint Discovery Plan and Scheduling Order (the “Scheduling Order”) [ECF. No. 24] was

1 filed on December 27, 2023. An Early Neutral Evaluation was held on February 15, 2024. [ECF
2 No. 36]. The case did not settle.

3 Per the Scheduling Order, the cutoff for discovery was May 7, 2024. Discovery is now
4 complete. Also per the Scheduling Order, dispositive motions are due to be filed by June 6, 2024.

5 **2. STIPULATION TO REASONABLY EXTEND DISPOSITIVE MOTION**
6 **DEADLINES**

7 The Parties conducted six depositions just prior to the discovery cutoff, and are awaiting
8 transcripts. In addition to the press of other business, counsel for both Parties have long-standing
9 personal family commitments during the months of May and June, including but not limited to
10 family gatherings and the graduation from college of the daughter of one of Plaintiff's counsel.
11 Counsel for the Parties have met and conferred on this topic and have agreed that, to best serve the
12 interests of the Parties and this Court, and to make the upcoming summary judgment motion practice
13 more efficient for both this Court and the Parties, the best remedy at this time is to reasonably
14 extend the dispositive motion deadline for both Parties.

15 This Stipulation is filed in excess of twenty-one (21) days prior to the current dispositive
16 motion deadline, as required by Paragraph 7 of the Scheduling Order. This Stipulation is not filed
17 for the purpose of undue delay, and the Parties will not be prejudiced by the stipulated extension of
18 time.

19 WHEREFORE, the Parties respectfully request that this Court extend the time for the parties
20 to file their dispositive motions by thirty (30) days from the current deadline of June 6, 2024 up to
21 and including July 8, 2024 (July 6 falls on a Saturday), and to extend the deadline for filing the
22 pretrial order by thirty (30) days, from July 8, 2024 to and including August 7, 2024. Per the
23 Scheduling Order, in the event one or both parties file a dispositive motion, "the joint pretrial order
24 shall be suspended until thirty (3) days after the decision of the dispositive motions or until further
25 order of the Court."

26 IT IS SO ORDERED.
Dated: May 14, 2024

27 .
28 .


Nancy J. Koppe
United States Magistrate Judge

1 RESPECTFULLY SUBMITTED BY THE FOLLOWING COUNSEL OF RECORD:

2
3 DATED this 13th day of May, 2024.

DATED this 13th day of May, 2024.

4 LEWIS BRISBOIS BISGAARD & SMITH LLP

RAFII & ASSOCIATES, P.C.

5
6 /s/ Jeffrey D. Winchester

/s/ Jason Kuller

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